

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

-----X	:	
JASON WILLIAMS,	:	
	:	
Plaintiff,	:	Case No.: 5:19-cv-00475-BO
	:	
vs.	:	
	:	
AT&T MOBILITY LLC,	:	
	:	
Defendant.	:	
-----X	:	

**DECLARATION OF PLAINTIFF JASON WILLIAMS
IN OPPOSITION TO AT&T'S MOTION FOR SUMMARY JUDGMENT**

I, Jason Williams, hereby declare under penalty of perjury that the following is true and correct and state as follows:

1. I am the plaintiff in the above-entitled action.
2. On September 24, 2021 my counsel provided AT&T with a letter regarding my Coinbase, Gemini, and Slush Pool cryptocurrency accounts, and the account names, associated email addresses, and periods of use for each account.
3. The information contained in that letter is entirely based on my provision of that same information to my counsel, and I hereby verify that such information was, and is, correct to the best of my knowledge.
4. I used the Coinbase, Gemini, and Slush Pool cryptocurrency accounts described in my counsel's September 24, 2021 letter in connection with my Bitcoin mining operation, and also used those accounts for unrelated, personal cryptocurrency activities and transactions.
5. I believe, based on my experience of the SIM swaps and their aftermaths, that the threats, privacy breaches, and fears that my family and I experienced in late 2018 and early 2019 were entirely related to the SIM swaps. Before November 5, 2018, the day AT&T first SIM

swapped my phone, I never received text messages and phone calls threatening me and my family. Before that day, to my knowledge, no one ever impersonated me online or over the phone. Before that day, to my knowledge, my online accounts, including my bank accounts and my personal email containing over a decades' worth of my personal and financial information, had never been hacked and compromised. Before that day, I had no reason to believe that any of my personal or financial information was available to criminals on the "Dark Web." As I testified to in my deposition, each of those events happened during or immediately after AT&T provided criminals direct use of my phone during AT&T's numerous SIM swaps against me.

6. During the period that I was subject to AT&T's SIM swaps, between November 2018 and February 2019, there were many nights when I was unable to sleep because I was so afraid for my and my family's safety. During those nights, I would stay awake with a gun in hand because I was afraid intruders would come to my home and attempt to harm me or my family. My fears seemed, and still seem, reasonable to me in light of threats I received, and the scale of the security and privacy breaches that occurred as a result of the SIM swaps.

7. Since I switched to Verizon, I have no longer had to deal with SIM swaps on my phone, or active hacking attempts on my online accounts. This may be due to Verizon's security efforts, or to my own continuing security efforts. But the fear of what criminals and hackers might do with the personal and financial information that AT&T gave them access to, and how they could use that information to compromise the safety, security, and privacy of me and my family, has not gone away, and I do not suspect it ever will. As just one example, I continue to fear that those criminals who accessed and used my personal email account, and a decade's worth of my personal emails, will use that information to harm or extort me and my family.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 2, 2022
New York, New York

By: _____

A handwritten signature in blue ink, consisting of a large, stylized 'J' followed by a series of loops and a final horizontal stroke.

Jason Williams